

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

ZTE (USA) INC.,

Defendant.

Civil Action No. 2:17-cv-00068

JURY TRIAL DEMANDED

PLAINTIFF'S ANSWER TO DEFENDANT'S COUNTERCLAIMS

Plaintiff Display Technologies, (LLC "Display") files this its Answer to Defendant ZTE (USA) Inc.'s ("ZTE") Counterclaims.

The unnumbered paragraphs of the Counterclaims are denied to the extent they require a response.

1. Admitted.
2. Admitted based on representation of ZTE.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted that venue is proper, to the extent other statements require a response they are denied.

COUNTERCLAIM I

DECLARATION OF NON-INFRINGEMENT-'723 PATENT

7. Display re-avers its foregoing responses.

- 8. Admitted.
- 9. Admitted.
- 10. Denied.
- 11. Denied.
- 12. Denied.

COUNTERCLAIM II

DECLARATION OF INVALIDITY-'723 PATENT

- 13. Display re-avers its foregoing responses.
- 14. Denied.
- 15. Denied.
- 16. Denied.

DEMAND FOR JURY TRIAL

- 17. No response required.

PRAYER FOR RELIEF

Display denies that defendant is entitled to the relief sought in Prayer for Relief section of the Counterclaims, and to the extent Display has not addressed any averments in the Counterclaims that are deemed to require a response, they are denied.

Dated: May 1, 2017

Respectfully submitted,

/s/ Thomas C. Wright
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was filed electronically in compliance with Local Rule CV-5, and thereby served on all counsel who have consented to electronic service this 1st day of May, 2017.

/s/ Thomas C. Wright
Thomas C. Wright, Ph.D.